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6                   **IN THE UNITED STATES DISTRICT COURT**  
7                   **FOR THE DISTRICT OF NEVADA**  
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9                   EILEEN LANAHAH,                   )

10   Plaintiff,                   )

11                   vs.                   )

2:06-cv-1176-LRH-LRL

12                   SOUTHERN NEVADA HEALTH                   )  
13                   DISTRICT,                   )

14   Defendant.                   )  
15   )  
16                   \_\_\_\_\_

17                   **STIPULATION AND REQUEST FOR EXTENSION FOR PLAINTIFF TO FILE**  
18                   **OPPOSITION TO MOTION FOR SUMMARY JUDGMENT AND FOR FILING**  
19                   **OF DEFENDANT'S REPLY BRIEF**

(First Request)

20                   IT IS HEREBY STIPULATED by the parties, by and through their respective  
21                   counsel of record, that Plaintiff be granted an extension of one week, up to and including  
22                   August 18, 2008, within which to file her opposition to the Defendant's Motion for  
23                   Summary Judgment. Defendant's Motion for Summary Judgment was filed on July 9,  
24                   2008. Accordingly, Plaintiff's response is presently due on August 11, 2008, and  
25                   Defendant's reply brief would be due on or about August 25, 2008.

26                   Plaintiff requests this extension because her attorney Richard Segerblom has been  
27                   unable to complete the opposition in the two weeks he has been back in town after  
28                   attending an oral argument before the Ninth Circuit and a legislative/legal conference

1 from July 18 until July 25. This is a substantial motion and as a sole practitioner Mr.  
2 Segerblom is required to juggle his day-to-day schedule along with preparing the  
3 opposition, so it has taken longer than originally planned.

4 IT IS FURTHER STIPULATED that because the Plaintiff's Opposition will be  
5 mailed on or about August 18, 2008, Defendant's reply brief will now be due on  
6 September 2, 2008.

7 This is the second request for an extension in this matter and is made in good faith  
8 and not for any reason of delay.

9 Therefore, it is requested that the court grant the Plaintiff up to and including  
10 August 18, 2008 within which to file her Opposition to Defendant's Motion for  
11 Summary Judgment, and further that the Defendant be granted an extension up to  
12 September 2, 2008 to file the reply brief.

13 DATED this \_\_\_\_ day of August, 2008.

14 Richard Segerblom, Ltd.

Fisher & Phillips LLP

15  
16 /s/ Richard Segerblom  
17 RICHARD SEGERBLOM, ESQ.  
18 704 South Ninth Street  
19 Las Vegas, NV 89101  
Attorney for Plaintiff

/s/ Shaun Haley  
SHAUN P. HALEY, ESQ.  
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Attorney for Defendant

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22 IT IS SO ORDERED.

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26 LARRY R. HICKS  
27 UNITED STATES DISTRICT JUDGE  
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